

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>  <i>Carol Bohannon (Deceased) v. Ethicon, Inc., Ethicon, LLC, and Johnson &amp; Johnson,</i>  <b>Case No. 2:13-cv-32876</b>	<b>Election Wave</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR  
DAUBERT RESPONSE AS TO JAIME L. SEPULVEDA-TORO, M.D.**

Plaintiff Carol Bohannon filed a notice adopting the Wave 1 motion to exclude the expert testimony of Jaime Sepulveda-Toro, M.D. Notice of Adoption, MDL Doc. 7317 (incorporating prior motion, MDL Doc. 2014, memorandum in support, MDL Doc. 2018, and reply, MDL Doc. 2225). In response, Defendants adopt and incorporate their prior responsive briefing. MDL Doc. 2138 (Wave 1 opposition); *see also* MDL Doc. 2508 (Wave 2 opposition); MDL Doc. 2929 (Wave 3 opposition); MDL Doc. 4495 (Wave 5 opposition). Defendants respectfully request that Plaintiff's motion to exclude be denied for the reasons stated in their prior responses.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage